

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KEONNE RODRIGUEZ and  
WILLIAM LONERGAN HILL

Defendants.

Case No. 24 Cr. 82 (RMB)

**DEFENDANT WILLIAM LONERGAN HILL'S MOTION TO SUPPRESS  
EVIDENCE OBTAINED THROUGH THE SEIZURE AND SEARCH  
OF HIS STORED ELECTRONIC COMMUNICATIONS**

PLEASE TAKE NOTICE that upon the (i) Declaration of Matthew L. Mazur, dated May 29, 2025, together with the exhibits attached thereto, and (ii) the accompanying Memorandum of Law, Defendant William Lonergan Hill, by and through the undersigned counsel, hereby moves this Court, before the Honorable Richard M. Berman, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007-1312, for an order, pursuant to the Fourth Amendment of the United States Constitution, suppressing evidence obtained from the government's seizure and search of William Lonergan Hill's personal Gmail account data, as well as any and all fruits of the unlawful seizure and search, and an order, pursuant to Fed. R. Crim. P. 41(g), for the return or destruction of any data that has not been identified as responsive to The Warrant.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's April 29, 2025 Order (ECF No. 85), the Government's response must be filed by June 26, 2025.

Dated: May 29, 2025

Respectfully submitted,

By: Roger A. Burlingame  
Roger A. Burlingame  
Matthew L. Mazur  
DECHERT LLP  
Three Bryant Park  
1095 Avenue of the Americas  
New York, NY 10036  
Tel.: +1 212 698 3500  
roger.burlingame@dechert.com  
matthew.mazur@dechert.com

*Counsel for Defendant William Lonergan Hill*